



**Passenger Vessel
Association**

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July 28, 2011

Federal Communications Commission
Washington, DC

Re: IB Docket No. 11-109

Ladies and Gentlemen:

The Passenger Vessel Association (PVA), the national trade association for U.S.-flagged passenger vessels of all types, appreciates this opportunity to submit comments to the Federal Communications Commission on IB Docket No. 11-109. The FCC should not approve the application by LightSquared or any other proposal for spectrum use if there is any possibility whatsoever that it might degrade GPS reliability or service, thereby jeopardizing the safe navigation of commercial passenger vessels in the United States.

PVA currently represents more than 550 vessel and associate members. Its members own and operate over 2,000 commercial passenger vessels. These include dinner cruise vessels, sightseeing and excursion vessels, passenger and vehicular ferries, private charter vessels, whalewatching and eco-tour operators, windjammers, gaming vessels, amphibious vessels, water taxis, and overnight cruise ships. Commercial passenger vessels in the United States carry well over 200 million passengers per year.

The diverse membership of PVA includes small family businesses with a single boat, companies with several large vessels in different locations, and governmental agencies operating ferries.

PVA's associate members are key suppliers to the passenger vessel industry, including marine architects, vessel builders and decorators, insurance companies, publishers, food supply companies, computer software and ticketing vendors, marine equipment suppliers, engine manufacturers, and others.

It is essential for the safety of the vessels of PVA members and the passengers that they serve that the Federal Communications Commission ensure that the Global Positioning System (GPS) system is not compromised in the slightest way. Yet, PVA understands that the conclusion of the report recently issued by the FCC-mandated Technical Working Group "... is that transmissions in the upper 10 MHz channel —the channel nearest to the 1559-1610 MHz GPS band — will adversely affect the performance of a significant number of legacy GPS receivers."

Vessels operated by PVA members determine their precise geographic locations by means of devices that connect to the GPS.

In February 2010, as a cost-cutting move, the U.S. Coast Guard discontinued its LORAN-C radiocommunications network, in large part because GPS was available and reliable. This was done even though maritime users urged the federal government to retain the LORAN-C capability as a safety back-up for GPS service. This plea for redundant safety capability was rejected, and the reliable LORAN-C system was sacrificed on the altar of federal budget constraints.

Now, PVA learns that the FCC seems to have "fast-tracked" an application by LightSquared for radio frequency bandwidth right next to the existing GPS radio bandwidth.

There is widespread concern among those who provide, and those who depend on, reliable GPS service that the LightSquared application, if granted, will seriously degrade existing GPS service that is essential for safe navigation in the maritime sector.

In conclusion, there appears to be a substantial risk that approval of the Lightsquared proposal will lead to the degradation of reliable GPS service. This will pose a threat to the safe navigation of commercial passenger vessels in the United States. The FCC should deny the Lightsquared proposal.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Spence". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

Captain Jay Spence
President